

# **Exhibit 35**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MONIQUE RUSSELL, JASMINE RIGGINS,  
ELSA M. POWELL AND DESIRE EVANS,

Plaintiffs

v.

EDUCATIONAL COMMISSION FOR  
FOREIGN MEDICAL GRADUATES,

Defendant

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Case No. 2:18-cv-05629-JW

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Hon. Joshua D. Wolson

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**DECLARATION OF DESIRE EVANS**

I, Desire Evans, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct:

1. I first encountered Oluwafemi Igberase, whom I knew as “Dr. Charles Akoda,” at Prince George's Hospital Center in Chevery, Maryland, for the delivery of my child in March of 2016.

2. Igberase’s treatment of me involved physical contact, including pelvic examinations, and the delivery of my child by c-section. Igberase additionally engaged in touching that made me feel uncomfortable at the time of my medical care, including the fondling of my clitoris, which he indicated would assist in my delivery. As this was my first experience having a baby, I trusted that his explanation for his conduct was medically valid.

3. Throughout all procedures and examinations performed by Igberase, I believed that he had received all appropriate and necessary medical training and was practicing obstetrics and gynecology as a duly licensed and credentialed physician. I trusted the organizations

responsible for verifying the credentials of physicians when I agreed to submit to medical care from him.

4. I first learned that the man I knew as “Dr. Akoda” had used a fraudulent identity and had not taken the appropriate steps to engage in the practice of medicine, in 2018.

5. Upon learning that the man I trusted to perform obstetric examinations and surgical procedures on me had engaged in this fraud, I experienced severe emotional distress. After learning this information, I experienced feelings of nausea, disgust, depression, sadness, sleepless nights reflecting on “Akoda’s” conduct, stress and anxiety, crying, impacts on my intimate relationship with my spouse, and nervousness. These symptoms were most serious in the first two years after I learned about Igberase’s conduct, but many of these symptoms continue today. In particular, I continue to have depression, anxiety and trust issues relating to doctors, as well as intimacy issues with my husband.

6. I entrusted the man I knew as “Akoda” with my life and the life of my child. Had I understood that the man I knew to be “Akoda” had engaged in identity fraud, and had not gone through the appropriate process to become credentialed as a physician, including by not submitting valid proof of having attended medical school, I would never have agreed to submit to medical and surgical treatment by him. His physical contact with me, including the performance of a c-section, was obtained without my consent and through fraud.

I declare under the penalties of perjury of the laws of the United States of America that the foregoing is true and correct.

Date: 1/12/2022

By:   
Desire Evans